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**7<sup>th</sup> May 2024**

Via email to [welfare.label@defra.gov.uk](mailto:welfare.label@defra.gov.uk)

## **GS1 UK Response to: Fairer Food Labelling Consultation**

GS1 UK is a not-for-profit membership body that sets and enables global standards across industry. Our standards are used ten billion times per day and form the basis of a global business language that identifies, captures and shares key information on products around the world – with the best known being barcodes and QR codes.

We welcome the opportunity to respond to the consultation on fairer food labelling, especially regarding the implementation of the proposals and its impact on packaging.

Whilst we are neutral to the policy decisions regarding whether to introduce this requirement and different levels of animal welfare, we do have expertise in capturing product information, product identification, and sharing this with consumers and industry.

Over the next 5 years industry will begin to transition away from the traditional on-pack barcode, towards a QR code that contains the same information but with added capability – QR powered by GS1.

Not only will this new standard fulfil the current function of the barcode, but it will allow producers to fulfil several EU and UK regulatory requirements digitally. For consumers, it means that when they scan the QR code they can easily access live information relevant to them – rather than trying to read small printed text on pack.

For regulators and verifiers, they can quickly check that the claims made about a product are correct and up to date, so that verification doesn't stop once a label is printed.

We believe that it is important for decision makers to understand this industry change, so that we can better make use of this in regulation. We have responded to the relevant questions, however please do contact us using the details below should you require any additional information.

**Question 1: Would you like your response to be treated as confidential?**

No

**Question 2. What is your name?**

Daniel Bellis

**Question 3. What is your email address?**

Daniel.Bellis@gs1uk.org

**Question 4. Which of the following best describes you (required)? (Select one option only)**

Industry (single business) – You are responding in an official capacity representing the views of a single business

**Question 9. If you are not responding as an individual in Question 4, please provide the name of your business/organisation.**

GS1 UK

**Question 10. If you are not responding as an individual in Question 4, where does your business or organisation operate (required)? Please select all that apply.**

GS1 operate in over 116 countries worldwide, including England, Scotland, Wales, NI and the EU.

**Question 11. If you are not responding as an individual in Question 4, where is your business or organisation's headquarters (required)?**

England

**Question 13. If you are not responding as an individual in Question 4, does your business source / sell agricultural or food products?**

No

**Question 14. If you are not responding as an individual in Question 4, what is the primary purpose of your business? (required)**

Other – GS1UK is part of a global standards body GS1

**Question 21. Should there be an additional requirement that mandatory origin information should be on the front of the pack?**

No. Space on front of pack is already extremely limited for many producers and manufactures, with a mix of pre-existing regulatory requirements and a desire to reduce overall packaging size. We believe that the best place to provide accurate additional information is via QR codes on pack.

These can be updated regularly to ensure compliance with changing regulation and consumer information, whereas printed packaging lines cannot.

**Question 23. Should the written origin of food be accompanied by a national flag or other symbol?**

No. We believe this should be done via QR.

**Question 24. What role should be played by labelling requirements for seafood, farmed or wild-caught, in order to encourage consumers to buy more locally caught or produced seafood?**

This type of labelling information can be complex to convey to the consumer on pack, and can be confused with other mandatory information on back of pack. Space on packaging is already limited, with a growing number of requirements and a desire to reduce the size and environmental impact of packaging.

Additional requirements such as those listed above should be made available to the consumer via on pack QR, which will allow the consumer to quickly find the information relevant to them.

**Question 27 a) Should there be a mandatory requirement to state the origin of meat, seafood and/or dairy products in the out-of-home sector?**

Neutral

**Question 27 b) If yes, what form should this requirement take?**

Where such a product is placed on packaging, this packaging should carry a QR code which contains the relevant information to meet the requirement.

Use of a QR code dramatically reduces the time and cost imposed on businesses typically incurred by labelling changes. Additionally, should supplier change, the business will not need to order a new packaging, as the information on the QR can be updated digitally.

**Question 29. If measures such as mandatory origin for minimally processed meat products, increasing the visibility of origin labelling, controlling the use of national flags and/or mandating origin labelling for the out-of-home sector were introduced, what do you think are realistic timescales for businesses to implement such policies from the point at which they are announced?**

2 years – if these measures were introduced via QR

**Question 31. Do you have any suggestions on how to smooth the costs and complexities of implementing these changes?**

We believe that the more mandatory labelling can be introduced via QR, the greater cost savings and consumer protections occur. Once established on packaging, QR can be updated to contain the latest information and consumer safety notices, with minimal costs to businesses.

**Question 36 a) Do you think the proposed 18-month implementation period, intended to reduce the cost associated with applying new mandatory labelling is appropriate?**

We believe that 18 months to 2 years is appropriate, if the labelling requirement is introduced via QR rather than direct on pack labelling.

**Question 37. Are there any other ways in which cost to business associated with applying new mandatory labelling could be reduced?**

We believe that the more mandatory labelling can be introduced via QR, the greater cost savings and consumer protections occur. Once established on packaging, QR

can be updated to contain the latest information and consumer safety notices, with minimal costs to businesses.

**Question 44 a) To what extent do you agree or disagree with our proposal that all unprocessed and minimally processed pork, chicken and egg products in scope are labelled regardless of whether they are packed at the consumer's request, prepacked for direct sale or prepacked in a factory before sale?**

Neutral

**Question 44 b) Please explain your answer.**

We do not believe that packaging location would make a material difference, if these labels were implemented via QR. Many on pack labels are already printed in store, for example on bakery goods or deli counters.

**Question 51 a) To what extent do you agree with the proposed tiered system above?**

Neutral

**Question 51 b) Please explain your answer.**

Whilst we are neutral on the content of the label itself, the current proposals may be complex to communicate on pack with limited space. Once again, we would advocate for this complex information set to be communicated via QR.

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**Question 63 a) Do you support providing a link to further information on the label?**

Yes, however we believe that all of these proposals should be communicated via QR, rather than an additional on-pack requirement. This would allow for the headline information, plus additional explainer information which can be regularly updated.

Additionally, assurance schemes can independently verify the integrity of the claims made of the product, by providing a live 'check' function whenever the produce is scanned.

**Question 63 b) Please provide detail on how this should be done and any impacts of this.**

As mentioned in our introduction, QR powered by GS1 will soon be on pack alongside the traditional barcode, before eventually replacing it. This GS1 standard will be able to facilitate all preexisting functions of the barcode, as well as being scannable by the consumer. This will present the consumer with live information on a range on topics of interest to them, from recycling information to animal welfare.

This can also include batch and serialisation specific information if necessary and desired.

**Question 66 a) To what extent do you support or oppose the proposal that membership of a recognised farm assurance scheme could be used by a Food Business Operator to help verify the production standards for UK farmers?**

Neutral

**Question 66 b) Please explain your answer and share any relevant supporting evidence.**

As mentioned, using QR to fulfil this function could allow farm assurance schemes to verify the integrity of claims made by FBOs automatically. When scanned, product information (such as farmed location) would be crosschecked against the database held by the farm assurance scheme, and an updated status shared with the consumer. This means that if status were to change, then the correct information would be displayed to the consumer, regardless of when the QR code was printed.

**Question 74 a) Do you agree or disagree that our proposed method of production labelling requirements should apply on a UK-wide basis?**

Agree

**Question 74 b) Please provide any evidence to support your view.**

Regardless of method of implementation, a UK wide approach provides greater clarity and for businesses and consumers. If divergence were to occur between the 4 nations of the UK, QR can allow for a single on-pack QR, Which adapts digitally to the geographic sale of the product, and relevant devolved regulations.

**Question 75 a) What differential impacts would these proposals have on you and/or your business if mandatory method of production labelling requirements were to apply on a GB-wide basis only, and the principles of the UKIM Act continued to apply, so that qualifying NI goods moving from**

## **NI to GB not meeting the method of production labelling requirements could be sold on the GB market?**

Where goods that do not meet this new regulation are moving from NI into GB, they could be identified via a simple scan of the relevant GS1 powered QR code, rather than manually checking for the correct on pack labelling and verification.

### **Dan Bellis**

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